

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: BRIAN C. BOGERT, JR.	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Objectant	:	
	:	
vs.	:	
	:	
GEORGE M. LUTZ, ESQUIRE	:	
Applicant	:	CASE NO. 1:20-bk-03241-HWV

TRUSTEE'S OBJECTION TO FIRST APPLICATION OF ATTORNEY
FOR CHAPTER 13 DEBTOR FOR COMPENSATION AND
REIMBURSEMENT OF EXPENSES

AND NOW, this 9th day of November, 2021, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through this attorney James K. Jones, who objects, pursuant to 11 U.S.C. § 330(a)(2), to the First Application of Attorney for Chapter 13 Debtor for Compensation and Reimbursement of Expenses filed on November 2, 2021 and states as follows:

1. Objectant Jack N. Zaharopoulos is the duly appointed Trustee in this case.
2. On November 5, 2020, Debtor filed a petition under Chapter 13 of the Bankruptcy Code.
3. On November 2, 2021, Applicant filed his First Application for Interim Compensation and Reimbursement of Expenses. (ECF No. 68)
4. Applicant's First Fee Application requests \$12,702.33 in fees and expenses.
expenses.
5. Trustee avers that the compensation and/or expenses requested in the First Fee Application are not reasonable for the following reasons:
 - a. The Fee Application does not comply with the requirements
of Local Rule 2016-2:

1. Paragraph 12 of the Application indicates that debtor did not review the application prior to filing. Local Rule 2016-1(a)(9) (incorporated through Local Rule 2016-2(b)) requires that an application include a certification that debtor has been given the opportunity to review the application and whether the debtor has approved the requested amount.

WHEREFORE, the Trustee respectfully requests this Honorable Court to set a hearing on the Application and after hearing appropriately adjust Applicant's request for compensation.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/James J. Jones
Attorney for Trustee
jjones@pamd13trustee.com

CERTIFICATE OF SERVICE

AND NOW, this 9th day of November, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

George M. Lutz, Esquire
1025 Berkshire Blvd, Suite 700
Wyomissing, PA 19610

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee